

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 25-07839
George H Kouriabalis,)	Honorable Timothy A Barnes
)	Chapter 13
DEBTOR.)	

NOTICE OF MOTION

TO: Thomas H Hooper, 55 E Monroe St. STE 3850, Chicago, IL 60603, via ECF;

See attached service list.

PLEASE TAKE NOTICE that on May 29, 2025, at 9:30 a.m., I will appear before the Honorable Timothy A Barnes, or any judge sitting in that judge's place, either in courtroom **744** of the Federal Dirksen Building, 219 South Dearborn Street, Chicago, IL 60604, or electronically as described below, and present the attached motion and you may appear if you so choose

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646- 828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 329 5276** and the passcode is **433658**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: /s/ John Wonais
Wonais Law, LLC
11070 S. Western Ave, STE 9
Chicago, IL 60643

CERTIFICATE OF SERVICE

I, John Wonais,

An attorney, hereby certify

That I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method shown on May 22, 2025, at or before 5:00 p.m.

By: /s/ John Wonais
Wonais Law, LLC
11070 S. Western Ave, STE 9
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(312) 883-5422
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Label Matrix for local noticing
0752-1
Case 25-07839
Northern District of Illinois
Eastern Division
Thu May 22 15:12:02 CDT 2025

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Citibank
PO Box 790040
St Louis, MO 63179-0040

Harlem & Milwaukee
7505 N Milwaukee Ave.
Niles, IL 60714-3621

IRS
PO BOX 7346
Philadelphia, PA 19101-7346

Jpmcb
MailCode LA4-7100
700 Kansas Lane
Monroe, LA 71203-4774

Mr. Cooper
Attn: Bankruptcy
Po Box 619098
Dallas, TX 75261-9098

Synchrony Bank/AVB Buying Group
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896-5060

John P Wonais
Wonais Law, LLC
11070 S. Western Ave., STE 9
Chicago, IL 60643-3928

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Chase Mortgage
Chase Records Center/Attn: Correspondenc
Mail Code LA4 5555 700 Kansas Ln
Monroe, LA 71203

First Midwest Bank
One Pierce Place Lower Level
Itasca, IL 60143-1254

Harlem & Milwaukee
C/O Sorman Frankel
180 N LaSalle St STE 2700
Chicago, IL 60601-2709

Inland Bank
2805 Butterfield Road
Oak Brook, IL 60523-1170

Lutheran General Hospital
1775 Dempster St
Park Ridge, IL 60068-1174

Santander Consumer USA, Inc
Attn: Bankruptcy
Po Box 961245
Fort Worth, TX 76161-0244

Adam G. Brief
Office of the U. S. Trustee, Region 11
219 South Dearborn
Room 873
Chicago, IL 60604-2027

Thomas H. Hooper
Office of the Chapter 13 Trustee
55 E. Monroe St.
Suite 3850
Chicago, IL 60603-5764

CFNA
Attn: Bankruptcy
Po Box 81315
Cleveland, OH 44181-0315

CitiBank C/O Manley Deas Kochalski
One East Wacker Suite 1250
Chicago, IL 60601-1980

Genesis FS Card Services
Attn: Bankruptcy
Po Box 4477
Beaverton, OR 97076-4401

IDOR - Bankruptcy Section
PO Box 19035
Chicago, IL 60619-0001

Jefferson Capital Systems, LLC
Attn: Bankruptcy
200 14th Ave E
Sartell, MN 56377-4500

Lvnv Funding/Resurgent Capital
Attn: Bankruptcy
Po Box 10497
Greenville, SC 29603-0497

Specialized Loan Servicing LLC
Attn: Bankruptcy
P.O. Box 630147
Littleton, CO 80163-0147

George H Kouriabalis
1032 Bette Lane
Glenview, IL 60025-2444

End of Label Matrix
Mailable recipients 25
Bypassed recipients 0
Total 25

**IN THE UNITED STATES BANKRUPTCY COURT
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MOTION TO EXTEND THE AUTOMATIC STAY

NOW COMES George H Kouriabalis, Debtor, by and through his attorneys, Wonais Law, LLC, and moves this Honorable Court to Extend the Automatic Stay, and in support thereof states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code on 05/22/2025 and a plan of reorganization on 05/22/2025. Debtor’s confirmation hearing is 7/10/2025. This case has not yet been confirmed by this Honorable Court.
3. The Debtor is requesting this Honorable Court to extend the automatic stay pursuant to Section 362 (c)(3)(A).
4. The Debtor previously a prior case dismissed within the past year. Debtor’s prior case, case number 24-13749, was filed on 09/18/2024 and dismissed on 03/20/2025 for failure to make plan payments.
 - a. In Debtor’s prior case, he suffered a heart attack and was hospitalized, rendering him unable to work.

- b. In Debtor's prior case, he was evicted from his place of business and unable to generate income.
 - i. That as a result, he was unable to make his plan payments and his case was dismissed.
- 5. In Debtor's current case, his circumstances have changed as follows (see affidavit attached as *Exhibit A*, and Schedules I and J as *Exhibits B and C*):
 - a. In Debtor's current case, Debtor has a second job and more income.
 - i. Debtor is operating his business, Exam Corp, out of his house now; and
 - ii. Debtor is taking medication for his heart.
 - b. As a result of Debtor's increased income and stable health, he can successfully complete his Chapter 13 Plan.
- 6. That Debtor is filing the instant case in good faith and intends to complete the Chapter 13 Plan.
- 7. That, equitably, the stay should be extended.

WHEREFORE, the Debtor, George H Kouriabalis, prays this Court for the following relief:

- A. That this Honorable Court extend the automatic stay for the reasons set for above; and
- B. For such other and further relief this court deems just and proper.

Respectfully Submitted,

By: /s/ John Wonais
Attorney for Debtor
Wonais Law, LLC
11070 S. Western Ave, STE 9
Chicago, IL 60643